

Exhibit A
Plaintiff's Mailing

Phone: (929) 789-2220
Charlesny09@yahoo.com

CHARLES SALDARRIAGA
PLAINTIFF PRO SE

1-20 Astoria Blvd Apt 4H
Astoria, New York 11102

May 27, 2025

VIA FIRST CLASS MAIL

Michael Futral
Assistant Corporation Counsel
Special Federal Litigation Division
The City of New York
LAW DEPARTMENT
100 Church Street
New York, NY 10007

Cc: Joseph Zangrilli
Senior Counsel

Re: Charles Saldarriaga v. The City of New York, et al.
Case number: 25-CV-1115

Response to Request for CPL §§ 160.50 and 160.55 Release


Dear Mr. Futral,

I am in receipt of your correspondence dated May 20, 2025, regarding your request for a signed "Designation of Agent for Access to Sealed Records." I appreciate your effort to move this litigation forward and understand the procedural concerns outlined in your letter. At this time, I am not prepared to execute the broad release enclosed. However, in the interest of cooperation and to facilitate a good faith exchange of information, I am enclosing a sworn affidavit voluntarily setting forth the basic facts surrounding the incident, including the date of arrest, location, duration of detention, and a summary of the injuries sustained.

This approach balances the City's interest in evaluating the claims with my privacy concerns related to the sealed records under CPL §§ 160.50 and 160.55. I trust this compromise will enable the parties to continue with discovery and the litigation process while preserving my statutory rights. Should the enclosed affidavit be deemed insufficient for a meaningful assessment of the case, I remain open to discussing a narrowly tailored stipulation or limited unsealing if and when a specific necessity is identified.

Please confirm receipt of the enclosed affidavit and advise whether it will suffice for the purposes of evaluating the initial claims and proceeding with litigation in a timely manner.

Respectfully,


Charles Saldarriaga
Plaintiff, Pro Se

**AFFIDAVIT
OF CHARLES SALDARRIAGA**

STATE OF NEW YORK

ss.:

COUNTY OF QUEENS)

I, Charles Saldarriaga, being duly sworn, depose and say:

1. I am the Plaintiff in the matter of Saldarriaga v. City of New York, et al., Case No. 25CV01115 (E.D.N.Y.)
2. I was taken into custody on or about March 27, 2024, in Astoria, Queens, New York. The matter was concluded in my favor on or about July 16, 2024
3. I was initially taken into custody by the NYPD and remained in custody for approximately 21 hours before being released.
4. During the post-arrest detention process, I experienced a heart palpitation episode, along with extreme emotional distress, anxiety, and physical discomfort. I was transported to a hospital for evaluation and, after medical assessment, returned to custody.
5. I am providing this affidavit voluntarily to assist the Corporation Counsel in evaluating the allegations without requiring immediate unsealing of records protected under CPL §§ 160.50 and 160.55.
6. This affidavit is submitted without waiving any of my statutory or constitutional rights, including the right to privacy with respect to sealed records.

I affirm under penalty of perjury that the foregoing is true and correct.

DATED: May 27, 2025

LOCATION: Astoria, New York


CHARLES SALDARRIAGA

